

STATE OF MARYLAND

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PUBLIC SERVICE COMMISSION

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

October 4, 2004

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Initial Comments of the Public Service Commission of Maryland  
WC Docket No. 04-133; CC Docket No. 01-338

Dear Secretary Dortch:

Enclosed please find the Initial Comments of the Public Service Commission of Maryland in response to the *Order and Notice of Proposed Rulemaking* released on August 20, 2004 in the above-captioned matter.

If you should have any questions concerning this filing, please contact me at (410) 767-8037.

Respectfully yours,

Tracey L. Stokes  
Assistant General Counsel

Enclosure

cc: Janice M. Myles, Wireline Competition Bureau, Competition Policy Division

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Before the  
Federal Communications Commission  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

IN THE MATTER OF )

*Unbundled Access to Network Elements* )

WC Docket No. 04-133

*Review of the Section 251 Unbundling  
Obligations of Incumbent Local Exchange  
Carriers* )

CC Docket No. 01-338

INITIAL COMMENTS OF THE  
PUBLIC SERVICE COMMISSION OF MARYLAND

Susan Stevens Miller  
General Counsel  
Public Service Commission of Maryland  
6 St. Paul Street, 16<sup>th</sup> Floor  
Baltimore, Maryland 21202  
(410) 767-8039

Tracey L. Stokes  
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(410) 767-8037

*Attorneys for the Public Service Commission of Maryland*

Dated: October 4, 2004

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*Attorneys for the Public Service Commission of Maryland*

Dated: October 4, 2004

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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**IN THE MATTER OF**

***Unbundled Access to Network Elements***

***Review of the Section 251 Unbundling  
Obligations of Incumbent Local Exchange  
Carriers***

**WC Docket No. 04-133**

**CC Docket No. 01-338**

**INITIAL COMMENTS OF THE  
PUBLIC SERVICE COMMISSION OF MARYLAND**

The Public Service Commission of Maryland ("MDPSC") respectfully submits these initial comments in response to the August 20, 2004, released *Order and Notice of Proposed Rulemaking* ("*Interim Order and NPRM*"), FCC 04-179, 69 Federal Register 55128 (September 13, 2004). The *Interim Order and NPRM* solicits input on a variety of issues related to the development of final network unbundling rules.

**I. SUMMARY OF COMMENTS**

In these comments, the MDPSC will describe the state-level proceedings initiated in response to the *Triennial Review Order*.<sup>1</sup> However, the state-level proceedings instituted were stayed as a result of the opinion issued by the United States Court of Appeals for the District of Columbia Circuit on March 2, 2004.<sup>2</sup> As such, the MDPSC did not hold hearings in either proceeding, nor did the MDPSC make any specific findings with respect to the issues presented.

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<sup>1</sup> *In the Matters of the Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Deployment of Wireline Services Offering Advances Telecommunications Capability*, Report and Order on Remand and Further Notice of Proposed Rulemaking, CC Docket Nos. 01-338, 96-98, and 98-147, FCC 03-36 (rel. Aug. 21, 2003) ("*Triennial Review Order*").

<sup>2</sup> *United States Telecom Association v. FCC*, 356 F.3d 554 (D.C. Cir. 2004) ("*USTA II*").

Furthermore, much of the information and data collected by or filed with the MDPSC in these proceedings was confidential in nature and subject to a non-disclosure Protective Order. Therefore, the MDPSC will not be making specific recommendations in response to the *Interim Order and NPRM*, nor will the MDPSC be filing the confidential data and testimony contained in its state-level proceedings.<sup>3</sup>

The MDPSC expects that the parties to its proceedings will be filing comments, inclusive of the information the parties filed in the MDPSC cases, directly with the Federal Communications Commission ("Commission"). To ensure that all parties are afforded a similar opportunity to comment to the Commission, the MDPSC is filing, on behalf of its Technical Staff, Staff's summary of its impairment analysis and testimony presented during the MDPSC proceedings, inclusive of Staff's recommendations. (See Tab 4) However, the MDPSC clarifies that Staff's comments and recommendations do not represent the official opinions of the MDPSC.

## **II. MDPSC PROCEDURAL BACKGROUND**

On October 2, 2003, the MDPSC issued notice to all Maryland telecommunications carriers establishing a schedule by which the MDPSC would commence the impairment review contemplated by the Commission in the *Triennial Review Order*. Specifically, the MDPSC directed that any carrier wishing to challenge the Commission's enterprise market switching impairment findings was to petition the MDPSC by October 17, 2003. Petitions seeking challenge to the Commission's enterprise market loops and transport, or mass market switching, impairment findings were to be filed with the MDPSC by October 31, 2004. No challenges were

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<sup>3</sup> The confidential data and information collected in connection with the MDPSC proceedings are subject to a protective order which precludes disclosure of the information absent either 1) the consent of the document's proponent; or 2) the issuance of a subpoena.

made to the Commission's presumptive enterprise market switching impairment analysis. However, Verizon Maryland Inc. did chose to challenge the Commission's presumptive impairment findings with respect to mass market switching, enterprise market transport, and enterprise market loops. Additionally, Verizon Maryland Inc. also filed proposals pertaining to a batch hot-cut process.

In light of Verizon Maryland Inc.'s challenges, the MDPSC docketed two state level proceedings. The first, Case No. 8983, *In the Matter of the Implementation of the Federal Communication Commission's Triennial Review Order*, was docketed to address the challenged impairment issues, while the second, Case No. 8988, *In the Matter of the Approval of a Batch Cut Migration Process for Verizon Maryland Inc. pursuant to the Federal Communication Commission's Triennial Review Order*, was docketed to develop a batch hot-cut process. Seventeen telecommunications carriers sought and were granted party status in both proceedings. Additionally, the United States Department of Defense, the Maryland Office of People's Counsel, and the Staff of the MDPSC were also granted party status. A listing of the parties to each of these proceedings follows in Tab 1.

Since the number of carriers participating in the actual proceedings was very small, the MDPSC developed and issued a data request seeking critical information from all carriers. The Initial Data Request to all Maryland Local Exchange Carriers was sent to 152 companies, and responses were received from 101 companies. A copy of the Initial Data Request, as well as a list identifying the carriers from whom the information was sought and who responded is attached as Tab 2. Although the majority of carriers to whom the data request was directed were not parties to either Case No. 8983 or 8988, they were informed that information provided in response to the data request would be subject to the Protective Order issued by the MDPSC in

Case No. 8983. As such, this information is only available by subpoena issued by the Commission, or with each company's consent. The data received from the MDPSC's Initial Data Request was consolidated and made available to each party that executed a protective order certification.

Direct testimony pertaining to switching and transport issues was filed in Case No. 8983 on January 26, 2004, and rebuttal testimony was filed on March 12, 2004. Direct testimony regarding the batch hot-cut process was filed on February 11, 2004. On March 15, 2004, prior to the filing date for testimony pertaining to the high-capacity loop issue, Case No. 8983 was stayed in response to the Court's decision in *USTA II*. Case No. 8988 was also stayed on March 16, 2004.

### **III. ACCESS TO MDPSC PROCEEDING RECORDS**

The current posture of Case Nos. 8983 and 8988 precludes the MDPSC from making a finding based upon the record as it currently exists. Likewise, the protective order applicable to both cases prohibits the MDPSC from providing confidential information to the Commission, absent a subpoena requesting the information. Nonetheless, access to the MDPSC's public record is readily available through the MDPSC website at: [www.psc.state.md.us/psc](http://www.psc.state.md.us/psc). Copies of the electronic case jackets for the MDPSC's proceedings are attached in Tab 3.

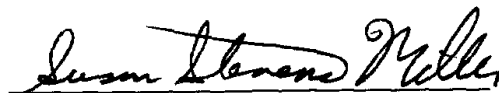
### **IV. CONCLUSION**

The MDPSC appreciates the opportunity to provide information to the Commission in this matter. As explained herein, the amount and type of information the MDPSC may provide is constrained by confidentiality considerations, which may only be bridged by consent from all parties whose information would be transmitted, or the issuance of a subpoena by the Commission requesting such information. The MDPSC believes that the majority of carriers

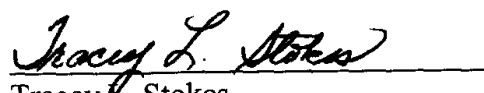


participating in Case No. 8983 and Case No. 8988 will avail themselves of the opportunity to participate in the Commission's comment process, as has the MDPSC's Staff.

Respectfully submitted,



Susan Stevens Miller  
General Counsel



Tracey L. Stokes  
Assistant General Counsel

Public Service Commission of  
Maryland  
6 St. Paul Street, 16<sup>th</sup> Floor  
Baltimore, Maryland 21202  
(410) 767-8039

Dated: October 4, 2004



**Party/Participants to Case Nos. 8983 and 8988**

A.R.C. Networks, Inc. d/b/a InfoHighway Communications Corp.  
Allegiance Telecom, Inc. d/b/a Allegiance Telecom of Maryland, Inc.  
AT&T Communications of Maryland, Inc.  
ATX Licensing, Inc.  
Cable Telecommunications Association of Maryland, Delaware and the District of Columbia  
Cavalier Telephone Mid-Atlantic, LLC  
Core Communications of Maryland, Inc.  
Covad Communications Company  
Intermedia Communications, Inc.  
KMC Telecom III, Inc.  
Maryland Office of People's Counsel  
MCI WorldCom Communications, Inc.  
MCI metro Access Transmission Services, L.L.C.  
Sprint Communications Company L.P.  
Staff of the Maryland Public Service Commission  
Starpower Communications, LLC  
United States Department of Defense and all Other Federal Executive Agencies  
XO MD Inc.  
Xspedius Communications, LLC.  
Z-Tel Communications, Inc.  
US LEC of Maryland (interested person status)



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RONALD A. GUNS  
HAROLD D. WILLIAMS

STATE OF MARYLAND



SUSAN S. MILLER  
GENERAL COUNSEL

FELECIA L. GREER  
EXECUTIVE SECRETARY

GREGORY V. CARMEAN  
EXECUTIVE DIRECTOR

PUBLIC SERVICE COMMISSION

FILED

DEC 04 2003

December 4, 2003

PUBLIC SERVICE COMM.  
OF MARYLAND

In the Matter of the Implementation of  
the Federal Communications  
Commission's Triennial Review Order.

\*

Case No. 8983

\*

\* \* \* \* \*

**INITIAL DATA REQUEST TO**  
**ALL MARYLAND LOCAL EXCHANGE CARRIERS**

On August 21, 2003, the Federal Communications Commission ("FCC") released its *Triennial Review Order*,<sup>1</sup> in which it adopted new network unbundling requirements and rules establishing a new standard for determining the existence of impairment under Section 251(d)(2) of the Telecommunications Act of 1996<sup>2</sup>. The *Triennial Review Order* delegates to the Public Service Commission of Maryland ("Commission") certain continuing fact-finding obligations.

On October 3, 2003, the Commission issued notice to all Maryland telecommunications carriers identifying various implementation issues contained in the FCC's *Triennial Review Order*, and establishing deadlines by which carriers wishing to challenge specific FCC findings were to petition the Commission. On October 31, 2003, Verizon Maryland Inc. ("Verizon") filed a Petition challenging the FCC findings with respect to mass market switching and dedicated transport. Verizon is to file its challenge to the FCC's high-capacity loop findings by December 19, 2003. In response to Verizon's Petition, the Commission docketed the above-captioned case.

<sup>1</sup> In the Matters of the Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Deployment of Wireline Services Offering Advances Telecommunications Capability, *Report and Order on Remand and Further Notice of Proposed Rulemaking*, CC Docket Nos. 01-338, 96-98, and 98-147, FCC 03-36, rel. Aug. 21, 2003. ("*Triennial Review Order*").

<sup>2</sup> 42 U.S.C. 251(d)(2).

In order for the Commission to consider the merits of Verizon's Petition, certain information must be obtained from all local exchange carriers ("LECs") authorized in Maryland. Therefore, pursuant to §§ 5-301 and 5-302, Public Utility Companies Article, *Md. Ann. Code*, and the authority delegated by the FCC in the *Triennial Review Order*, the Commission hereby directs all Maryland local exchange carriers to respond to the attached questionnaires. The information received by the Commission in response to this data request shall be treated as proprietary by the Commission and covered under the Commission's Protective Order issued in Case No. 8983, a copy of which is attached. As indicated in the Commission's Protective Order, third-party access to the information shall be limited to those official parties to Case No. 8983 that have filed Protective Order Certifications with the Commission. All responses to the Commission's initial data request shall be filed with the Commission, in the manner indicated below, on or before December 15, 2003. Furthermore, all responses to this data request should be amended when the respondent obtains information upon the basis of which (a) the respondent knows the response was incorrect when made, or (b) the respondent knows the response was correct when made, but is no longer accurate. This data request is deemed to be continuing in nature so as to require updated responses in light of pertinent facts or information that becomes known or available.

The Commission's Initial Data Request is based upon a proposal submitted by the Commission Staff.<sup>3</sup> The data request consists of three separate questionnaires pertaining to: 1) High Capacity Loop Questions; 2) Switching Questions; and 3) Transport Questions. Responding LECs are required to populate an electronic spreadsheet with their responses in the format indicated, and submit with their filing a completed and signed verification attesting to the accuracy of the information contained in the spreadsheets. The spreadsheets may be downloaded from the Commission's website through the "Telecommunications" link. After completing the questionnaires, save the populated spreadsheets electronically with your company name replacing the word "question" in the title of the spreadsheet. For example: "MD loop COMPANY NAME.xls"; "MD switching COMPANY NAME.xls"; "MD transport COMPANY NAME.xls". Questions concerning the spreadsheets or the information requested may be addressed to Jason Cross at (410) 767-8055 or via email at [jcross@psc.state.md.us](mailto:jcross@psc.state.md.us).

One hard copy and one electronic copy of each company's response to the Commission's data request are to be filed with Renee M. Williams, Administrative Services Supervisor, Public Service Commission of Maryland, 6 St. Paul Street, 16<sup>th</sup> Floor, Baltimore, Maryland 21202, not later than Monday, December 15, 2003. The electronic version of the filed spreadsheets shall be provided in Microsoft Excel 97 format on 3.5 diskettes or compact disk.

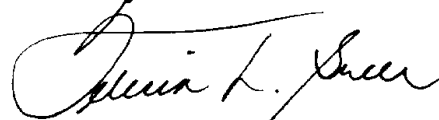
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<sup>3</sup> Staff's proposal was based on the spreadsheets and questions utilized by the Staff of the New Jersey Board of Public Utilities.

As mentioned earlier, third-party access to the information collected by the Commission will be strictly limited to party-intervenors in Case No. 8983 that have signed and filed the Commission's Protective Order Certification. Such individuals may gain access by requesting a user ID and password through the Commission's website under the "Telecommunications" link.<sup>4</sup> The user ID and password will be provided to the requestor once it has been verified that the individual is a party and has signed the required documentation. As the responses are received from the LECs, the information provided to the Commission will be made available through the Commission's website to those entities that have requested access.

Finally, in addition to the Commission issued data request on this issue, local exchange companies may also receive discovery requests from parties to Case No. 8983. The Commission directs all carriers to respond to all relevant requests as provided in the Commission's Notice of Procedural Schedule issued in this docket, a copy of which is also attached. All discovery disputes to non-Commission discovery requests shall also be conducted in accordance with the process identified in the procedural notice.

By Direction of the Commission,



Felecia L. Greer  
Executive Secretary

FLG:lvs

Attachments

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<sup>4</sup> Detailed instructions will appear on the Commission's website.

### **INSTRUCTIONS for "MD loop\_questions.xls"**

The information requested is to be provided on an electronic spreadsheet: "MD loop\_questions".xls. The spreadsheet includes a few rows of example entries. Respondents should remove the example information before entering their own information. The number of spreadsheet rows which each ILEC and CLEC will be required to provide data on depends upon the number of customer locations for which each company has provisioned facilities. The electronic spreadsheets are set up in a manner that will allow the responses to be compiled, and queried in an efficient manner. For any additional questions concerning the spreadsheets or the information requested, contact Jason Cross at (410) 767-8055 or via e-mail at [jcross@psc.state.md.us](mailto:jcross@psc.state.md.us).

After completing the spreadsheets, please save them electronically in Microsoft Excel 97 with your company name replacing the word "question" in the title of the spreadsheet. For example "MD loop\_" should precede your company name (e.g., MD loop\_COMPANY NAME.xls). File along with hard copy on 3.5 diskettes or compact disk by December 15, 2003. Please refer to the Commission Letter for detailed filing information.



**MD PSC High-Capacity Loop Questions**  
**(for both ILECs and CLECs)**  
**FCC Rules, Sections 51.319 (a) (4), (5) and (6)**

Fill in the electronic spreadsheet "MD loop\_questions.xls" with the following information for each Maryland State customer location for which your company has deployed high-capacity loop facilities. These facilities might be used either by your own retail customers, or by an unaffiliated carrier's customer. Include facilities for both those customers served entirely by your own facilities and those for customers served by attaching your own optronics to activate dark fiber transmission facilities provided by another carrier.

- 1) Street address of customer served by high-capacity loop (e.g., 6 St Paul St.). (*Column A*)
- 2) City of customer served by high-capacity loop ( e.g., Baltimore). (*Column B*)
- 3) State of customer served by high-capacity loop (i.e., MD). (*Column C*)
- 4) Five-digit zip code address of customer served by high-capacity loop (e.g., 21202). (*Column D*)
- 5) Customer Location V Coordinate (if readily available, e.g., 4700). (*Column E*)
- 6) Customer Location H Coordinate (if readily available, e.g.,1640). (*Column F*)
- 7) High-capacity loop type (dark fiber, DS1, DS3). (*Columns G – I*)
- 8) Customer serving wire center eight-digit CLLI code (e.g., CITYMDZZ). (*Column J*)
- 9) Serving wire center V Coordinate (e.g., 4639). (*Column K*)
- 10) Serving wire center H Coordinate (e.g., 1629). (*Column L*)
- 11) The number of circuits serving the customer location (e.g., the number of circuits at DS1 level, the number of circuits at DS3 level, or the number of dark fibers.). (*Columns M - O*)
- 12) Does your company have access to the entire customer location, including each individual unit within that location? [Section 51.319(a)(5)(ii)(B)] (*Column P*)
- 13) Is the customer location served entirely by your company's facilities? (*Column Q*)
- 14) Is the customer location served by attaching your company's optronics to activate dark fiber transmission facilities provided by another carrier? (*Column R*)
- 15) Indicate if the customer location is served via an unaffiliated carrier to which your company has provided dark fiber. (*Column S*)

**MD PSC High-Capacity Loop Questions (con't)**

**Page 2**

- 16) Is this high-capacity loop facility used to provide service to your company's retail customers? (*Column T*)
- 17) Is this high-capacity loop facility used by another carrier to provide service to its retail customers? (*Column U*)

In the Matter of the Implementation of the  
Federal Communication Commission's  
Triennial Review Order.

\*  
\*  
\*

Case No. 8983

### VERIFICATION

State of .....

County of .....

..... verifies and states: I  
(name)

am the ..... of .....  
(Title of Respondent) (Name of Reporting Company)

I am familiar with the preparation of the foregoing information and know generally the contents  
thereof. Said information consists of .....  
(Identification of the Information)

.....  
.....  
is true and correct to the best of my knowledge and belief. As to matters not actually stated  
upon my knowledge, the sources of my information and the grounds for my belief are as follows:

.....  
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.....  
Signature

**Company Name Goes Here**

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21202

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			<i>Enter "Y" if yes, blank if no</i>	<i>Enter "Y" if yes, blank if no</i>	<i>Enter "Y" if yes, blank if no</i>	<i>Enter "Y" if yes, blank if no</i>	<i>Enter "Y" if yes, blank if no</i>	<i>Enter "Y" if yes, blank if no</i>
The number of dark fibers serving the customer location	The number of DS1 circuits serving the customer location	The number of DS3 circuits serving the customer location	Does your company have access to the entire customer location, including each individual unit within that location?	Is the customer location served entirely by your company's facilities?	Is the customer location served by attaching your company's optronics to activate dark fiber transmission facilities provided by another carrier?	Indicate if the customer location is served via an unaffiliated carrier to which your company has provided dark fiber.	Is this high-capacity loop facility used to provide service to your company's retail customers?	Is this high-capacity loop facility used by another carrier to provide service to its retail customers?
<u>M</u>	<u>N</u>	<u>O</u>	<u>P</u>	<u>Q</u>	<u>R</u>	<u>S</u>	<u>I</u>	<u>U</u>

note: delete this row and example rows below before adding your own company information  
8 2 Y

note: delete this row and example rows below before adding your own company information  
Y

## **INSTRUCTIONS for MD switching\_questions.xls**

The information requested is to be provided on an electronic spreadsheet: "MD switching\_questions.xls." This spreadsheet includes a row of example entries. Respondents should remove the example information before entering their own information. The electronic spreadsheets are set up in a manner that will allow the responses to be compiled, and queried in an efficient manner. The number of spreadsheet rows which each ILEC and CLEC will be required to provide data on depends upon the number of switches for which each company has provisioned facilities. For any additional questions concerning the spreadsheets or the information requested, contact Jason Cross at (410) 767-8055 or via e-mail at [jcross@psc.state.md.us](mailto:jcross@psc.state.md.us).

After completing the spreadsheets, please save them electronically in Microsoft Excel 97 with your company name replacing the word "question" in the title of the spreadsheet. For example "MD switching\_" should precede your company name (e.g., MD switching\_COMPANY NAME.xls"). File along with hard copy on 3.5 diskettes or compact disk by December 15, 2003. Please refer to the Commission Letter for detailed filing information.

**MD PSC Switching Questions**  
**(for both ILECs and CLECs)**  
**FCC Rules, Section 51.319 (d) (2)**

Fill in the electronic spreadsheet "MD switching\_questions.xls" with the following information for each Maryland State serving switching entity that you have self-provisioned. These switches may provide service to either your company's MD retail customers or might be used by another carrier to provide service to its MD customers.

- 1) Please provide the 11-digit COMMON LANGUAGE® Location Identifier CLLI™) of each switch used to provide qualifying service anywhere in the state of New Jersey. (*Column A*)
- 2) Category type of switch. Check one of the following (End Office, Tandem Office, Multi-Function, Remote Line, Packet, Broadband, Cellular, Other). (*Columns B - I*)
- 3) Number of DS-0/voice grade equivalent access lines equipped. (*Column J*)
- 4) Number of DS-0/voice grade equivalent access lines in use. (*Column K*)
- 5) Does this switch serve residential customers? (*Column L*)
- 6) If yes to column L how many single line residential customers does this switch serve (*Column M*)?
- 7) Columns N to AB require the identification of business customers by line size served by each of your switches. Please provide the number of business customers and the total number of lines used by those customers in the 0 to 6, 7 to 12, 13 to 18, 19 to 24, and greater than 25 line categories. (*Column N to AB*)
- 8) Switching entity street address. (*Column AC*)
- 9) Switching entity city. (*Column AF*)
- 10) Switching entity state (i.e., MD). (*Column AG*)
- 11) Switching entity five digit zip code (e.g., 21202). (*Column AH*)
- 12) Is this switching facility used to provide service to your own retail customers? (*Column AI*)
- 13) Is this switching facility used by another carrier to provide service to its retail customers? (*Column AJ*)
- 14) Identify, by eight-digit CLLI code, each wire center district served (i.e., the territory served by a NJ ILEC switch). (*Beginning in Column AK, use one column for each applicable wire center district.*)

In the Matter of the Implementation of the  
Federal Communication Commission's  
Triennial Review Order.

\*  
\*  
\*

Case No. 8983

### VERIFICATION

State of .....

County of .....

..... verifies and states: I  
(name)

am the ..... of .....  
(Title of Respondent) (Name of Reporting Company)

I am familiar with the preparation of the foregoing information and know generally the contents  
thereof. Said information consists of .....  
(Identification of the Information)

.....  
.....  
is true and correct to the best of my knowledge and belief. As to matters not actually stated  
upon my knowledge, the sources of my information and the grounds for my belief are as follows:

.....  
.....  
.....  
.....

.....  
Signature



Fill in the electronic spreadsheet **"MD switching\_questions.xls"** with the following information for each Maryland switching entity that you have self-provisioned. These switches may provide service to either your company's MD retail customers or might be used by another carrier to provide service to its MD customers.

[illegible]